

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

EXXON MOBIL CORPORATION,

Plaintiff

v.

ARJUNA CAPITAL, LLC and FOLLOW  
THIS,

Defendants.

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Civil Action No. 4:24-cv-00069-P

**PLAINTIFF’S MOTION TO SET EXPEDITED  
SUMMARY JUDGMENT BRIEFING SCHEDULE**

In accordance with Federal Rule of Civil Procedure 57, Plaintiff Exxon Mobil Corporation (“ExxonMobil”) respectfully requests that this Court set an expedited summary judgment briefing schedule for ExxonMobil’s request for declaratory relief.

1. On December 14, 2023, Arjuna Capital, LLC (“Arjuna”) submitted a shareholder proposal for inclusion in ExxonMobil’s proxy statement for its 2024 annual shareholder meeting (the “2024 Proposal”).

2. The next day, Follow This joined the 2024 Proposal as a co-filer with Arjuna.

3. On December 22, 2024, ExxonMobil sent each of Arjuna and Follow This a letter to acknowledge receipt of the 2024 Proposal and to provide notice of certain deficiencies in the proposal.

4. On January 3, 2024, Arjuna sent ExxonMobil a response to ExxonMobil’s deficiency notice. Follow This did not respond to ExxonMobil’s deficiency notice.

5. On January 21, 2024, ExxonMobil filed a complaint seeking a declaratory judgment that it may exclude the 2024 Proposal from its proxy materials under Securities and Exchange Commission (“SEC”) Rule 14a-8 and notified the SEC of its intention to exclude the proposal.

6. ExxonMobil's next annual shareholder meeting is scheduled for May 29, 2024.

7. ExxonMobil plans to finalize its proxy statement by March 20, 2024, to timely format, print, and manage the logistics of mailing approximately 150,000 copies of the proxy statement to ExxonMobil shareholders by April 11, 2024. This timeline aligns with ExxonMobil's schedule in prior years.

8. This publication date also will allow ExxonMobil to invest the significant time and resources required to meaningfully engage with its five million shareholders, while also ensuring that it complies with the federal securities law filing deadline of April 19, 2024 (40 days prior to the annual shareholder meeting).

9. Because this case presents purely legal issues, ExxonMobil intends to file a motion for summary judgment regarding its request for declaratory judgment.

10. Under Rule 57 of the Federal Rules of Civil Procedure, ExxonMobil respectfully requests an expedited summary judgment briefing schedule for ExxonMobil's request for declaratory relief.

11. A proposed order granting this relief is attached.

Dated: January 25, 2024

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with Arjuna and Follow This about this Motion to Set Expedited Summary Judgment Briefing Schedule. Counsel for Arjuna informed me that Arjuna opposes the motion. Follow This informed me that it had not yet engaged counsel for this matter but that it expects to oppose the motion.

/s/ Mark W. Rasmussen  
Mark W. Rasmussen

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2024, I electronically filed the foregoing documents with the Clerk of Court using the CM/ECF system, and caused them to be served on the Defendants in the following manner:

Via International Mail and E-mail:  
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